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7 *Attorneys for the United States*  
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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MID-CENTURY INSURANCE COMPANY, )

12 Plaintiff, )

13 v. )

14 JAMES ANTHONY SMITH; MISTER )  
JONATHAN JACKSON, III; ANDERSON )  
15 MOORE, MALCO ENTERPRISES OF )  
NEVADA, INC. )

16 Defendants. )  
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Case No. 2:18-cv-00087-RFB-CWH

**STIPULATION FOR EXTENSION OF  
TIME**

**(Second Request)**

18 Plaintiff Mid-Century Insurance Company and the United States of America<sup>1</sup>, through their  
19 respective counsel, hereby stipulate to extend the time for the United States to file a responsive  
20 pleading to **Monday, April 2, 2018**. The United States does not waive any defenses it may have,  
21 including those defenses listed in Fed. R. Civ. P. 12(b).

22 This is the parties' second request for an extension of time for the United States to file a  
23 responsive pleading. The stipulation is not sought for purposes of delay. At this time, the parties have  
24 conferred and believe that resolution short of continued litigation is possible and seek to focus their  
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26 <sup>1</sup> The United States filed a Notice of Substitution (ECF No. 3) pursuant to 28 U.S.C. § 2679(b)(1) and (d), which provides that suit against the United States, and not an individual, is the exclusive remedy for negligence claims against a government employee arising out of acts performed within the course and scope of employment.

1 time and resources toward those discussions.

2 Respectfully submitted this 13th day of February 2018.

3 Law Office of Lisa A. Taylor

DAYLE ELIESON  
United States Attorney

4 /s/ Lisa A. Taylor

/s/ Mark E. Woolf

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*Attorneys for the United States*

11 **IT IS SO ORDERED.**

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14 **C.W. Hoffman, Jr.**  
15 **United States Magistrate Judge**

16 **Dated:** February 14, 2018  
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